

NOTICE OF VIOLATION

Tennessee Valley Authority
Watts Bar Unit 1

Docket No. 50-390
License No. NPF-90

During an NRC inspection conducted from November 10 through December 21, 1996, three violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

- A. Technical Specification 5.7.1.1 requires, in part, that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, Quality Assurance Program Requirements (Operations). Appendix A of Regulatory Guide 1.33, Section 9, includes procedures for control of maintenance activities.

Site Standard Practice (SSP)-6.02, Maintenance Management System, Revision 16, requires the following:

- Step 2.5.4: "If configuration changes are required that are not controlled by written site or planning instructions, then use Appendix R, "Configuration Control Log for Wire Lifts" or "Configuration Control Log for Configuration Changes".... List configuration changes in sufficient detail to uniquely identify each item, and initial and date...."
- Step 2.3.3.C.6.a: "If the scope of the WO changed during performance, then verify the WO has been reevaluated and the PMT revised to reflect the scope change or is still adequate...."
- Step 2.4.3.C.15: "Ensure PMTs including any additional PMTs on Appendix L, "addendum to planning Form..."

Contrary to the above, between October 13, 1996, and October 15, 1996, the licensee failed to initiate a configuration control log for configuration changes that would sufficiently identify each item disconnected while performing maintenance activities on auxiliary feedwater system level control bypass valve 1-LCV-3-148A. Specifically, the licensee did not identify the outlet port of the valve prior to disconnecting the air tubing while troubleshooting. This resulted in the tubing being reconnected to the exhaust port of the valve instead of the outlet port. Also, licensee personnel failed to: 1) reevaluate the work order and the post-maintenance testing to reflect changes in work

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scope; and 2) adequately document and verify post-maintenance testing on an Appendix L. These failures resulted in auxiliary feedwater system level control bypass valve 1-LCV-3-148A being inoperable from October 15, 1996, to November 27, 1996.

This is a Severity Level IV violation (Supplement I).

- B. Technical Specification 5.7.1.1 requires, in part, that procedures shall be established, implemented, and maintained covering the activities recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, Quality Assurance Program Requirements (Operations). Appendix A of Regulatory Guide 1.33, Section 9, includes procedures for control of maintenance activities.

Plant Instruction (PI) 1-PI-OPS-1-FP, Freeze Protection, Revision 0, Step 5.2.[2] requires, in part, "[a] verification that all freeze protection devices, such as heat trace or space heaters have power and are operable...[b] verifications that all control equipment, i.e., recorders, thermostats and alarms, are operable..."

Contrary to the above, on December 11, 1996, the NRC identified that the licensee failed to establish adequate procedures to verify the operability of freeze protection devices as specified in Step 5.2.[2]. Specifically, the freeze protection checksheet contained in 1-PI-OPS-1-FP, which is used for field verification, only required circuit breaker position to be checked and did not require verification of operability. Examples are:

- Temperature recorders 0-TR-234-1 (Auxiliary Building) and 0-TR-234-2 (Intake Pumping Station) are not checked and both recorder temperature data logger paper drives were inoperable.
- Thermostat temperature switch setpoint manipulation to verify operability is not performed; only the freeze protection device circuit breaker is verified to be in its required position on freeze protection checksheets.
- The refueling water storage tank level transmitter cabinet heaters and the 5000 gallon demineralized water tank circuits 449 and 450 could not be verified as operable.
- Thermostats for the main feedwater transmitter sensing lines are not checked for operability.

This is a Severity Level IV violation (Supplement I).

- C. Technical Specification 5.7.2, Programs and Manuals, requires, in part, that programs shall be established, implemented, and maintained for:

"Explosive Gas and Storage Tank Radioactive Monitoring Program. The program shall include: a) The limits for concentrations of hydrogen and oxygen in the Waste Gas

Holdup System and a surveillance program to ensure the limits are maintained..."

The Final Safety Analysis Report (FSAR), Section 11.3, Gaseous Waste Systems, requires, in part, that:

"One automatic sequential gas analyzer determines the quantity of oxygen and hydrogen in the gas space of the volume control tank, pressurizer relief tank, holdup tanks, evaporators, gas decay tanks, reactor coolant drain tank..."

Contrary to the above, on December 4, 1996, the NRC determined that the licensee failed to implement a surveillance program, as identified in the FSAR, Section 11.3, to determine if hydrogen and oxygen levels are maintained within limits. Specifically, the licensee did not have the waste gas analyzer aligned to automatically determine the quantity of oxygen in the specified tanks. The failure to automatically monitor the gaseous level in the tanks has existed since plant licensing.

This is a Severity Level IV violation (Supplement I).

Pursuant to the provisions of 10 CFR 2.201, Tennessee Valley Authority is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector at the facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at Atlanta, Georgia
this 16th day of January 1997